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Proposed Attorneys for Debtor  
 Pinnacle Foods of California, LLC

UNITED STATES BANKRUPTCY COURT  
 EASTERN DISTRICT OF CALIFORNIA  
 FRESNO DIVISION

In re

Pinnacle Foods of California, LLC,

Debtor-in-Possession.

CASE NO.: 2024-11015

DC No.: MJB-2

Chapter 11 (Subchapter V)

Date: April 24, 2024

Time: 11:30 a.m.

Place: 2500 Tulare Street, Suite 2501  
 Fresno, CA 93721

Judge: Hon. René Lastreto II

**DECLARATION OF IMRAN DAMANI IN SUPPORT OF MOTION FOR  
 AUTHORITY TO USE CASH COLLATERAL**

I, Imran Damani, hereby declare and represent as follows:

1. I am the President and Managing Member of Pinnacle Foods of California, LLC (the "Debtor" or "Pinnacle") and the person responsible for the management of the Debtor. I am an insider of the Debtor. The Debtor operates six franchise Popeyes restaurants at various locations in Fresno, California. The Debtor's revenue comes from the sale of sandwiches and other food sold by the Debtor.

2. I am familiar with the Motion and Budget filed in support of the Motion for Authority to Use Cash Collateral ("Motion") and attest to the fact that the

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1 information contained therein is true and correct to the best of my knowledge.

2 3. The cash collateral sought to be used are proceeds from sales of sandwiches  
3 and other food at the six Popeyes restaurants.

4 4. The proceeds as well as the cash on hand are subject to UCC liens held by  
5 Signature Financial & Leasing LLC, Backd/Austin Business Finance, and Fresno County  
6 Tax Collector (the "Secured Creditors").

7 5. By this Motion the Debtor seeks to grant Secured Creditors affected by  
8 the Motion replacement liens as adequate protection for the emergency use of cash  
9 collateral for the next 10 days until the continued hearing on the Motion. By that  
10 time, the Debtor will have a more complete six-month budget filed with the Court in  
11 support of the Motion.

12 6. I make this Declaration in support of the Cash Collateral Motion which  
13 I have read, reviewed, and helped to prepare. I hereby adopt each of the factual  
14 allegations in the Motion for Authority to Use Cash Collateral and incorporate them  
15 in this Declaration by reference. Except as otherwise indicated, all statements in this  
16 Declaration are based upon my personal knowledge, my review of relevant business  
17 documents, or my opinion.

18 7. Attached as Exhibit "A" is a budget of the cash collateral the Debtor  
19 seeks authority to use for the next 10 days ("Subject Period"). I prepared the Budget.  
20 The Debtor has no source of operating funds except cash collateral.

21 8. In order to continue to operate and formulate a Plan, the Debtor in  
22 Possession has an immediate need for use of cash collateral. The Budget attached to  
23 this Declaration sets out the amounts of money needed for the Subject Period.

24 9. By continuing to operate Debtor's six Popeyes restaurants, the Debtor  
25 will produce and generate new revenue that has a value greater than the amount of  
26 cash collateral sought to be used. The funds will also preserve and protect the  
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1 collateral. From the use of cash collateral, Debtor will be able to pay its employees,  
2 rent, royalties, insurance, food supplies, and other essential operating expenses and  
3 continue franchise operations.

4 10. Denial of the use of cash collateral will not benefit any creditor  
5 constituency but it would cause significant harm to the Debtor.

6 11. As adequate protection for any potential decline in value, it is agreed  
7 that the Secured Creditors should have replacement liens to the extent any have valid  
8 liens.

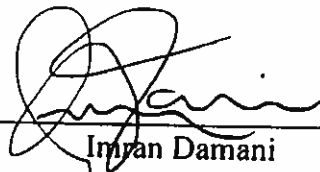
9 12. The Debtor seeks to grant a replacement lien to the extent cash  
10 collateral is actually used on assets of a like nature to those held on the Petition Date.

11 13. I am unaware of any secured creditors having liens or security interests  
12 in the subject cash collateral except the Secured Creditors. However, The Debtor  
13 seeks authority to use cash collateral of any such creditor, if any, provided the  
14 creditor was served with notice of the Motion. I believe that it is in the best interests  
15 of the creditors of this estate to be allowed to use cash collateral. Without use of cash  
16 collateral the Debtor will be forced to shut down all operations.

17  
18 I declare under penalty of perjury that the foregoing facts are true and correct.

19 Executed on April 23, 2024, at Fresno, California.

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21  
22 By: \_\_\_\_\_

  
Imran Damani